

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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04 - 12587 JLT

UNITED STATES OF AMERICA,

Plaintiff,

vs.

16.086 ACRES OF LAND, MORE OR
LESS, SITUATE IN BARNSTABLE
COUNTY, COMMONWEALTH OF
MASSACHUSETTS, AND EDWIN
ALFRED THOMPSON, ET AL.

Defendants.

CASE NO.

TRACT NO. A-189-E

**MOTION FOR ORDER FOR
DELIVERY OF POSSESSION**

The plaintiff, the United States of America, by and through the undersigned counsel, moves this Honorable Court for an order vesting in plaintiff the right to immediate possession of the property condemned herein, and requiring all defendants to this action and any and all persons in possession or control of the property, as described in the Declaration of Taking filed herein, to surrender possession of the said property to the extent of the estate condemned, to the plaintiff forthwith. This Court should grant this Motion for the below-stated reasons:

1. Title to the property condemned herein immediately vested in the United States upon the filing of the Declaration of Taking in this action and the deposit of estimated just compensation into the registry of the Court. Thereafter, the United States is entitled

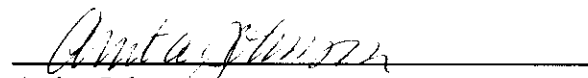
to possession.

2. The plaintiff has found and determined that it is necessary and advantageous to the interest of the United States of America to acquire possession of the property condemned. Such land is required for the proper administration, protection and development of the Otis National Guard Base, Mashpee, Massachusetts, for military operations.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By:


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